

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LUCKY BUCKS HOLDINGS LLC,

Debtor.

Chapter 7

Case No. 23-10756 (KBO)

MARC ABRAMS,
In his capacity as Chapter 7 Trustee of
Lucky Bucks Holdings LLC and as
assignee,

Plaintiff,

v.

TRIVE CAPITAL MANAGEMENT LLC, *et al.*,

Defendants.

Adversary Proceeding

Adv. Proc. No. 24-50130 (KBO)

**DECLARATION OF MARIO O. GAZZOLA IN SUPPORT OF THE TRUSTEE'S
OPPOSITION TO TRIVE DEFENDANTS' MOTION TO COMPEL**

I, Mario O. Gazzola, hereby declare under penalty of perjury:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), counsel for Marc Abrams, solely in his capacity as chapter 7 trustee (the "Trustee") for Lucky Bucks Holdings LLC (the "Debtor"), in the above-captioned action. I submit this declaration in support of the Trustee's Opposition to Trive's Motion to Compel ("Trive Mot."). I have personal knowledge of the matters set forth in this declaration based upon my involvement in this case and a review of the file.

2. Attached as **Exhibit 1** is a true and correct copy of the Trive Defendants' Responses and Objections to a Rule 2004 subpoena from the Trustee, dated April 12, 2024.

3. Attached as **Exhibit 2** is a true and correct copy of a letter from the Trive Defendants' counsel to counsel for the Trustee, dated February 27, 2025.

4. Attached as **Exhibit 3** is a true and correct copy of a letter from counsel for the Trive Defendants, dated August 8, 2025.

5. Attached as **Exhibit 4** is a true and correct copy of correspondence between counsel for the Trustee and Trive.

6. Attached as **Exhibit 5** are true and correct copies of the search term reports reflecting the hits for the search terms Trive requested the Trustee apply to the Noteholders' documents.

7. Attached as **Exhibit 6** is a true and correct copy of an email chain between counsel to the Trustee and counsel to the Defendants.

8. Trive continued producing documents and privilege logs responsive to the Trustee's Rule 2004 subpoena until May 14, 2025.

9. To date, the Trustee has produced over 240,000 documents to Trive.

10. Prior to filing the Complaint in this action, counsel to the Trustee had multiple common interest privileged conversations with the Noteholders about the events in the Complaint. Based on those conversations, many of which involved conversations between the Trustee's counsel and in-house counsel for different Noteholders, the Trustee's counsel requested specific compilations of documents from the Noteholders, which were collected and compiled at counsel's request for use in preparing the Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this August 26, 2025 at New York, New York.

/s/ Mario O. Gazzola

Mario O. Gazzola